

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

THE SHANE GROUP, INC. *ET AL.*,

Plaintiffs, on behalf of themselves  
and all others similarly situated,

vs.

BLUE CROSS BLUE SHIELD OF  
MICHIGAN,

Defendant.

Civil Action No. 2:10-cv-14360

Judge Denise Page Hood

Magistrate Judge Mona K. Majzoub

**NOTICE REGARDING AMENDMENT TO  
CLAIM FORMS AND LONG-FORM NOTICE**

The parties wish to inform the Court of one planned change to the draft long-form notice and claim forms previously submitted to the Court. The footer on the first page of these three drafts suggested that there would be Spanish-language information available on the settlement website. This line was included inadvertently. Plaintiffs' understanding is that parties do not have a legal obligation to provide foreign language translations, and that such translations are not provided on settlement websites absent special circumstances making it appropriate, such as claims particularly affecting populations with low rates of English speakers. No special circumstances exist here. To the contrary, census

data show that Michigan has a small Hispanic population compared to the United States as a whole.

Plaintiffs did not intend to provide any translations, and, after discussing the issue with the claims administrator, Epiq, continue to believe it is unnecessary in this case. The cost of translation would come out of the Settlement Class's recovery, outweighing the benefit of the translated material in our view.

Accordingly, Plaintiffs plan to remove the line from the footer of the long-form notice and claim forms, and Defendant has no objection. To meet the schedule established by the Court's preliminary approval order, the long form notice and the claim forms will need to be posted on the website by July 25. If the Court has any concerns about this course of action, we can be available to discuss them telephonically at the Court's convenience.

July 14, 2014

Respectfully submitted,

/s/ Daniel A. Small

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